

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE DIAL CORPORATION, et al.,

Individually and on behalf of Similarly  
Situated Companies,

Plaintiffs,

v.

NEWS CORPORATION, et al.,

Defendants.

Civil Action No. 13-cv-06802-WHP

**PLAINTIFFS' PROPOSED VOIR DIRE**

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*Co-Lead Counsel for Plaintiffs*

Plaintiffs The Dial Corporation, Henkel Consumer Goods Inc., H. J. Heinz Company LP, Kraft Heinz Foods Company, Foster Poultry Farms, Smithfield Foods, Inc., HP Hood LLC, and BEF Foods, Inc., acting in their individual capacity and on behalf of similarly situated companies, respectfully submit the below proposed voir dire:

**Educational Background**

1. What is the highest degree or level of education you have received?

**Work Background**

2. Are you currently employed? If so, where are you employed and what is your current position?

**Knowledge of the Case And Relevant Opinions**

3. Before today, had you read, seen or heard anything about this lawsuit?
4. Do you have any knowledge of or opinions about class action lawsuits, in general, that would affect your ability to decide this case based only on the evidence presented at trial?
5. Do you have any opinions about civil lawsuits seeking large money damages if business harm is proven, that might make it difficult for you to be a fair and impartial juror?

**Case Relevant Experiences And Opinions**

6. How often do you use coupons that you clip out of a newspaper or advertisement, or non-clipped discounts (*e.g.* discount codes online)?
7. Have you ever worked for a supermarket, drug store chain, or mass merchandise retailer?
8. Have you ever worked in advertising, sales or marketing or transacted business with others who worked in advertising, sales or marketing?
9. What newspapers do you read or from what other sources do you get news?

February 23, 2016

Respectfully submitted,

KRAMER LEVIN NAFTALIS  
& FRANKEL LLP

/s/ Daniel B. Goldman

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**CERTIFICATE OF SERVICE**

I, James H. Smith, hereby certify that a copy of the foregoing has been served via ECF upon counsel for Defendants on February 23, 2016.

/s/ James H. Smith  
James H. Smith